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STATEMENT OF

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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION
COMMON CARRIER BUREAU
FORUM ON COMBINATIONS OF UNBUNDLED NETWORK ELEMENTS

JUNE 4, 1998

The SBC telephone operating companies, Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell offer seven standard methods of access for Competitive Local Exchange Carriers ("CLECs") to combine Unbundled Network Elements ("UNEs"). These seven methods of access include the traditional physical and virtual collocation and five alternative methods for combining UNEs. In addition, we stand ready to negotiate other methods of access.

UNE Combinations

While the combination of the local loop and the local switch port is the UNE combination that receives most of the attention, there are many other combinations that must also be accommodated by any method of access that is provided to the CLECs. These include:

- Local Loop and Dedicated Transport
- Local Switching and Dedicated Transport
- Dedicated Transport and other Dedicated Transport
- Dedicated Transport and SS7 Signal Transfer Point
- Dedicated Transport and OS/DA switch

There are two distinct combining scenarios that must be addressed. In one scenario, the CLEC desires to combine some of its own equipment with UNEs. In the second scenario, the CLEC desires to combine UNEs obtained from the Incumbent Local Exchange Company ("ILEC") without utilizing any additional facilities.

Combinations of CLEC equipment with UNEs.

A facility-based CLEC that operates its own switch and/or transmission equipment may wish to collocate a remote terminal, either digital loop carrier or remote switching module, in a SBC central office. This equipment must be combined with UNEs, such as local loops, in order to provide a telecommunications service. SBC offers both physical and virtual collocation for this purpose.

Physical Collocation

Physical collocation is provided in a secure area, separated from the local central office equipment of the SBC operating company. The CLEC technicians have access on a 24-hour/7 day-a-week basis in order to combine UNEs with the equipment placed in the collocation cage. Cables, either copper or fiber, ordered by the CLEC as part of the collocation arrangement are terminated in the collocation space and extended to the distributing frames of the central office. The CLEC may designate the cable pairs to be

used to extend UNEs to the collocation space. All combinations of UNEs can be made in a collocation space.

Virtual Collocation

Where space for physical collocation is not available, or upon request of the CLEC, virtual collocation may be provided. Virtual collocation allows a CLEC to interconnect and obtain access to UNEs by arranging for the UNEs to be cross-connected to the equipment that is located in the central office space of the SBC operating company.

Combinations of UNEs with UNEs

In locations where a CLEC does not desire to locate any equipment in the SBC central office or does not wish to use its facilities obtained under collocation agreements to combine UNEs, five methods of access to UNEs are offered.

Method 1. If a CLEC is physically collocated in a SBC central office or tandem office, SBC will extend UNEs that require cross connection to a Point of Termination (POT) frame in the CLEC's physical collocation cage. This may be a separate POT frame than that used for interconnection in the cage. Using this method, the CLEC has secure access to its circuits and they are protected from access by others.

Method 2. If a CLEC is physically collocated in a SBC central office or tandem office, SBC will extend UNEs that require cross connection to a CLEC UNE access point (common frame) located in a collocation common area (inside the secure collocation area but outside of the individual CLEC cage). This method provides a CLEC an option of connecting UNEs that do not require connection to CLEC equipment in the collocation space. All physically collocated CLECs choosing Method 2 in a office will have access to the same common frame.

Method 3. SBC will extend UNEs that require cross connection to a CLEC UNE frame located in a common area room space within the central office or tandem office building. The CLEC point of access will be located in a secure area of the building other than the collocation space. This will allow CLECs to share a common frame for the connection of SBC UNEs. The CLEC will not have access to its own equipment from this point.

Method 4. SBC will extend UNEs to an external Point of Presence, such as a cabinet located outside the central office or tandem office building, provided by SBC on SBC property. This arrangement will operate like Method 3, except that the point of access will be outside of the SBC building.

Method 5. SBC will allow extension of UNEs to a building not controlled by SBC via cabling provided by the CLEC. The CLEC will provide the cable necessary to reach

from a manhole outside the central office building to the SBC Distribution Frame in the SBC central office where the CLEC requests connection.

Methods 1 and 2, listed above, are only available to physically collocated CLECs.

Methods 3 through 5 are available to both collocated and non-collocated CLECs.

None of the above methods require the CLEC to invest in equipment to provide service to customers. The pricing plans are based on a cost per pair of wires used to extend the UNEs to the point of access and are assessed on a per-pair basis when ordered by the CLEC.

Combining UNEs in the collocation spaces or the points of access that I have just described will not result in service inferior to that provided by SBC to its own retail customers. Cross-connections made in the central office environment are stable connections that are not normally subject to failure. The lengths of the tie cables between the collocation space or the point of access is not sufficient to cause significant transmission losses. These same types of cross-connections and tie cables to be used for these arrangements have been used for decades by SBC companies to provide retail customer services that require the insertion of equipment needed to improve transmission quality.

In summary, SBC offers more than the single method of access to UNEs that Chairman Kennard (in his March 20, 1998, letter to Senators McCain and Brownback) stated the Bureau Staff believes is necessary to demonstrate that the ILEC satisfies the statutory nondiscrimination requirement for access to UNEs.

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